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A PROFESSIONAL LIMITED LIABILITY COMPANY

June 19, 2020

**Via ECF**

Honorable Lewis J. Liman  
United States District Judge  
Southern District of New York  
500 Pearl Street, Courtroom 15C  
New York, New York 10007

**Re: Charmaine Freeman v. YMVS LLC and Anthony Cardozo, *Individually*  
(Case No. 1:20-cv-03163-LJL)  
First Request to Adjourn the Initial Pretrial Conference**

Your Honor:

This office represents the Plaintiff, Charmaine Freeman ("Plaintiff"), in the above-referenced action. We write to respectfully request an adjournment of the Initial Pretrial Conference currently scheduled for June 26, 2020 at 11:00 a.m. to a date determined by the Court, for the reasons stated below.

The Complaint was filed on April 21, 2020. As such, under F.R.C.P. Rule 4(m), Plaintiff must serve all Defendants by July 20, 2020. Plaintiff served Defendant YMVS LLC on May 28, 2020, and Defendant's answer was due on June 18, 2020. To date, there has been no appearance made on behalf of YMVS LLC. In addition, our process server has not yet been able to effectuate service on the Individual Defendant Anthony Cardozo. Plaintiff is continuing to attempt to serve Individual Defendant Anthony Cardozo, and we are in contact with our process server in order to effectuate service upon Defendant Cardozo by the July 20, 2020 deadline.

Accordingly, if the Court permits, Plaintiff respectfully requests that the Court grant an adjournment of the initial pretrial conference to a date the Court deems necessary to provide time for Defendants' counsel to appear.

This is Plaintiff's first request for an adjournment of the Initial Pretrial Conference.


We thank Your Honor for your time and consideration of this request.

Respectfully submitted,

/s/ Brittany A. Stevens  
Brittany A. Stevens, Esq.

Application GRANTED. The Initial Pretrial Conference is RESET to July 28, 2020 at 11:00 a.m. It will proceed telephonically. The parties are directed to call (888) 251-2909 and use access code 2123101.

6/19/2020



LEWIS J. LIMAN  
United States District Judge